

THE HONORABLE MARSHA J. PECHMAN

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KENNETH I. DEANE

Plaintiff,

vs.

PACIFIC FINANCIAL GROUP, Inc., a
Washington corporation, MEGAN P. MEADE,
an unmarried woman; NICOLAS B. SCALZO,
an unmarried man; JAMES C. MCCLENDON,
a married man; JAMES C. MCCLENDON and
JOAN A. MCCLENDON, a marital community;
GAETAN T. SCALZO, a married man;
GAETAN T. SCALZO and SHERRIE
SCALZO, a marital community,

Defendants.

NO. 2:19-cv-00722-MJP

STIPULATION RE PROPOSED THIRD
AMENDED CASE SCHEDULE

Plaintiff Kenneth Deane (“Plaintiff”) and Defendants The Pacific Financial Group, Megan Meade, Nicolas Scalzo, James McClendon and Gaetan Scalzo (“Defendants”), by and through their respective counsel, stipulate and agree to the following (proposed) amended case schedule and submit the same for consideration to the Court pursuant to the Court’s June 1, 2020 telephonic conference and Minutes Entry (Dkt. 60).

Event	Dates Unchanged	Old Date	New Date
BENCH TRIAL DATE	October 26, 2020		
Reports from expert witnesses under FRCP 26(a)(c) due		June 29, 2020	July 17, 2020

All motions related to discovery must be filed by and noted on the motion calendar on the third Friday thereafter (see CR7(d))		April 27, 2020	June 19, 2020
Discovery completed by		May 26, 2020	July 17, 2020
All dispositive motions must be filed by and noted on the motion calendar on the fourth Friday thereafter (see CR7(d))		June 22, 2020	July 29, 2020
All motions in limine must be filed by and noted on the motion calendar no earlier than the third Friday thereafter and no later than the Friday before the pretrial conference.	September 28, 2020		
Agreed pretrial order due	October 14, 2020		
Trial briefs	October 14, 2020		
Pretrial conference	October 20, 2020, at 1:30 p.m.		
Length of trial	6 days		

The parties agree that expert depositions may occur after the discovery cutoff but no later than August 10, 2020. The parties may update their experts' opinions based on information obtained on or after the discovery deadline.

The parties further stipulate that because of the additional counterclaims each side may serve up to fifteen (15) additional written interrogatories on the other side.

The parties, by and through their undersigned counsel, stipulate to this motion and the following proposed order.

IT IS SO STIPULATED, THROUGH COUNSEL, OF RECORD.

1 DATED this 5th day of June, 2020.

2 Presented by:

3 THE ROSEN LAW FIRM

4
5 By: /s/ Jon Howard Rosen
6 Jon Howard Rosen, WSBA #7543
7 The Rosen Law Firm
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13 **Attorney for Plaintiff:**

14 Kenneth Deane

15 GORDON REES SCULLY MANUSUKHANI LLP

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17 By: /s/ Nicole E. Demmon
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26 **Attorneys for Defendants:**

Pacific Financial Group, Inc.;
Megan P. Meade; Nicholas B. Scalzo and
Eva M. Scalzo; James C. McClendon and
Joan A. McClendon; and Gaetan T. Scalzo and
Sherrie Scalzo

ORDER

Based on the foregoing joint motion of the parties, and good cause appearing, therefore,
IT IS HEREBY ORDERED THAT the case schedule be amended as follows:

Event	Dates Unchanged	Old Date	New Date
BENCH TRIAL DATE	October 26, 2020		
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Length of Trial	6 days		

Each side may serve up to an additional fifteen (15) written interrogatories on the other side. Expert depositions may occur after the discovery cutoff but no later than August 10, 2020. The parties may update their experts' opinions based on information obtained on or after the discovery deadline.

1 IT IS SO ORDERED.

2 DATED this _8th_ day of June, 2020.

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7 Marsha J. Pechman
8 United States Senior District Judge

9 Presented by:

10 THE ROSEN LAW FIRM

11 By: /s/ Jon Howard Rosen
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Joan A. McClendon; and Gaetan T. Scalzo and
Sherrie Scalzo